

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, New Jersey 08625
Attorney for State Defendants

By: Matthew J. Lynch
Deputy Attorney General
(609) 633-8687

Vincent J. Rizzo, Jr.
Deputy Attorney General
(609) 633-7786

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF NEWARK

_____	:	
ISRAEL ALMEIDA and	:	HON. KEVIN MCNULTY, U.S.D.J.
MICHAEL TUMMINELLI,	:	
	:	Civil Action No 16-3411 (KM-JBC)
Plaintiffs,	:	
	:	
v.	:	
	:	NOTICE OF MOTION TO FILE EXHIBITS
THE HON. N. PETER	:	UNDER SEAL PURSUANT TO <u>L. CIV. R.</u>
CONFORTI, et al.,	:	5.3(c)
	:	
_____	:	
Defendants.	:	

To: Clerk of the Court
United States District Court
For the District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Ryan Scott Watson, Esq.
Law Offices of J. Scott Watson PC
24 Regency Plaza
Glen Mills, PA 19342

Stephen Stamboulieh, Esq.
Stamboulieh Law PLLC
P.O. Box 4008
Madison, Mississippi 39130

Alan Alexander Beck, Esq.
2692 Harcourt Drive
San Diego, CA 92123

Dawn M. Sullivan, Esq.
Dorsey & Semrau LLC
714 Main Street
P.O. Box 228
Boonton, NJ 07005

Ursula Henrich Leo, Esq.
Laddey, Clark & Ryan, LLP
60 Blue Heron Road
Suite 300
Sparta, NJ 07871-2600

PLEASE TAKE NOTICE that on September 19, 2016, or at such other time as it may please the Court, the undersigned, Attorney General Christopher S. Porrino, by Deputy Attorneys General Matthew J. Lynch, appearing for Defendants, Honorable N. Peter Conforti, Shaina Brenner, Honorable Carmen H. Alvarez, Honorable Marie P. Simonelli, and Christopher Porrino (pled as Robert Lougy) ("State Defendants"), shall move before the Honorable James B. Clark, U.S.M.J., in the United States Court House, Newark, New Jersey, for an Order permitting State Defendants to file exhibits under seal with the Clerk's Office, pursuant to L. Civ. R. 5.3(c), because these documents are the plaintiffs' confidential firearms application materials identified as Exhibits A and B to the Brief of State Defendants in support of

their motion to dismiss and in opposition to Plaintiffs' motion for preliminary injunction.

In support of this motion, State Defendants will rely upon the hereto attached Declaration of Matthew J. Lynch and Statement that No Brief Is Necessary, served and filed herewith.

It is respectfully requested that the court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to Fed. R. Civ. P. 78.

A proposed form of Order is attached hereto.

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Matthew J. Lynch
Matthew J. Lynch
Deputy Attorney General

DATED: August 19, 2016